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7
Attorneys for Defendants and Counterclaimants
8   VIA TECHNOLOGIES, INC. and
VIA TECHNOLOGIES, INC. USA
9
                    UNITED STATES DISTRICT COURT
10
                  NORTHERN DISTRICT OF CALIFORNIA
11
                         SAN JOSE DIVISION
12

13   COMPUTER CACHE COHERENCY   )
     CORPORATION,   )   Case No. 05-CV-01668 RMW (HRL)
14   )   Case No. 05-CV-01766 RMW (HRL)
                     Plaintiff,   )   (Cases consolidated through claim
15   )   construction)
            v.   )
16   )   This document pertains to:
     VIA TECHNOLOGIES, INC. and VIA   )   Case No. 05-CV-01668 RMW (HRL)
17   TECHNOLOGIES, INC. (USA),   )
)   **JOINT STIPULATION AND**
18   Defendants and Counterclaimants.)   **[PROPOSED] ORDER REGARDING**
)   **WITHDRAWAL OF VIA'S MOTION TO**
19   _____   )   **COMPEL CCCC'S PRODUCTION OF**
)   **DOCUMENTS, INCLUDING**
20   COMPUTER CACHE COHERENCY   )   **DOCUMENTS IMPROPERLY**
     CORPORATION,   )   **WITHHELD BASED ON CLAIMS OF**
21   )   **PRIVILEGE WHICH HAVE BEEN**
                     Plaintiff,   )   **WAIVED; AND TO DEEM ADMITTED**
22   )   **VIA'S FIRST SET OF REQUESTS FOR**
            v.   )   **ADMISSIONS**
23   )
     INTEL CORPORATION,   )   Date: July 18, 2006
24   Defendant and Counterclaimant.)   Time: 10:00 a.m.
)   Court: Courtroom 6, 4th floor
25   )   Before: Hon. Howard R. Lloyd
26   _____

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     JOINT STIPULATION AND [PROPOSED] ORDER RE:
     WITHDRAWAL OF VIA'S MOTION TO COMPEL
     PRODUCTION OF DOCUMENTS
     CASE NO. 05-CV-01668 RMW (HRL)

1   WHEREAS:

2   VIA Technologies, Inc. and VIA Technologies, Inc. (USA) (collectively "VIA") has filed

3 a "Motion to Compel CCCC's Production Of Documents, Including Documents Improperly Withheld

4 Based On Claims Of Privilege Which Have Been Waived; And To Deem Admitted VIA's First Set Of

5 Requests For Admissions" ("Motion to Compel") which has been set for hearing on July 18, 2006 at

6 10:00 a.m. before the Honorable Howard R. Lloyd;

7   Plaintiff Computer Cache Coherency Corporation ("CCCC") has represented that it will

8 promptly produce drafts, correspondence, and emails regarding the original and revised

9 AMD/CCCC agreements, upon receiving consent from AMD to do so;

10   VIA and CCCC have resolved all other issues addressed by VIA's Motion to Compel;

11

12   THEREFORE, the Parties STIPULATE THAT:

13   Plaintiff Computer Cache Coherency Corporation ("CCCC") will promptly produce

14 drafts, correspondence, and emails regarding the original and revised AMD/CCCC agreements,

15 upon receiving consent from AMD to do so; and

16   VIA hereby withdraws its Motion to Compel.

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18 Dated: June 22, 2006   WILSON SONSINI GOODRICH & ROSATI
                                                   Professional Corporation
19

20
                                                   By: /s/ Jennifer Ochs
21   Robert P. Feldman
                                                        Jennifer A. Ochs
22   Maura L. Rees
                                                        Matthew R. Reed
23
                                                   Attorneys for Defendants and
24   Counterclaimants
                                                   VIA TECHNOLOGIES, INC. and
25   VIA TECHNOLOGIES, INC. (USA)

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JOINT STIPULATION AND [PROPOSED] ORDER RE: -2-   2904537_1.DOC
WITHDRAWAL OF VIA'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS
CASE NO. 05-CV-01668 RMW (HRL)

1   Dated: June 22, 2006   HENNIGAN, BENNETT & DORMAN LLP

2

3   By: /s/ Omer Salik
                                                                       Omer Salik
4
                                                             Attorneys for Plaintiffs and
5   Counterdefendants
                                                             COMPUTER CACHE COHERENCY
6   CORPORATION
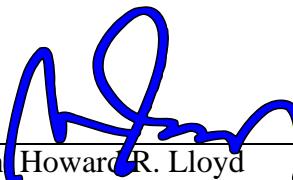
7

8   PURSUANT TO STIPULATION, IT IS SO ORDERED

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10   Dated: _____June 26, 2006_____   By: _____
                                                      Hon. Howard R. Lloyd
11   United States Magistrate Judge

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     JOINT STIPULATION AND [PROPOSED] ORDER RE: -3-   2904537_1.DOC
     WITHDRAWAL OF VIA'S MOTION TO COMPEL
     PRODUCTION OF DOCUMENTS
     CASE NO. 05-CV-01668 RMW (HRL)

1   **Attestation Pursuant to General Order 45.X.B**

2

3   Pursuant to General Order 45.X.B, I hereby attest that concurrence in the filing of this

document was obtained from each of the other signatories.

4

5

6   Dated: June 22, 2006   WILSON SONSINI GOODRICH & ROSATI
                                                                Professional Corporation

7

8
                                                                By: /s/ Jennifer Ochs
9   Robert P. Feldman
                                                                        Jennifer A. Ochs
10   Maura L. Rees
                                                                        Matthew R. Reed
11
                                                                Attorneys for Defendants and
12   Counterclaimants
                                                                VIA TECHNOLOGIES, INC. and
13   VIA TECHNOLOGIES, INC. (USA)

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JOINT STIPULATION AND [PROPOSED] ORDER RE: -4-   2904537_1.DOC
WITHDRAWAL OF VIA'S MOTION TO COMPEL
PRODUCTION OF DOCUMENTS
CASE NO. 05-CV-01668 RMW (HRL)